

REMARKS

This Amendment is in response to the Office Action mailed 01/26/2007. In the Office Action, the Examiner rejected claims 1-21 under 35 U.S.C. § 102 and rejected claims 1, 5, 8, 11 and 18 under 35 U.S.C. § 112. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. § 102

3. The Examiner rejected claims 1-21 under 35 U.S.C. § 102(e) as being anticipated by Redlich (U.S. Patent No. 6,591,306).

4. In regard to claims 1, 8, the Examiner asserts that Redlich discloses:

a first plurality of peer devices, each of the first plurality of peer devices not being coupled to any other of the first plurality of peer devices; Figure 4, Figure 5, Figure 8

a first network server coupled to each of the first plurality of peer devices, the first network server to manage and maintain a first name-to-address resolution index that includes a list of addresses for each of the first plurality of peer devices, the first network server configured to respond to requests for a peer device addresses of the first plurality of peer devices by querying the first name-to-address index; column 7, lines 61-65, column 8, line 6

a second plurality of peer devices, each of the second plurality of peer devices not being coupled to any other of the first and second pluralities of peer devices; Figure 8

a second network server coupled to each of the second plurality of peer devices and to the first network server, the second network server to manage and maintain a second name-to-address resolution index that includes a list of addresses for each of the second plurality of peer devices, the second network server configured to respond to a request for a peer device address of one of the first plurality of peer devices by querying the first network server such that the second network server responds to the request with the peer device address of the one of the first plurality of peer devices as though the request was for a peer device address of one of the second plurality of peer devices. Column 8, lines 1-18

Applicant respectfully disagrees. Redlich defines a server as "a program." Col. 7, lines 8-10. The present application defines a server as a "computer or device." Specification, p.4, lines 14-17. Applicant has amended the claims to replace "server" with --server device-- to make this distinction clear. Applicant is unable to find anything in the cited figures or text that discloses a server device or a hierarchical network system structure as claimed. In particular, applicant finds nothing in the cited art that discloses "the second network server device configured to respond to a request for a peer device address of one of the first plurality of peer devices by querying the first network server device such that the second network server device responds to the request with the peer device address of the one of the first plurality of peer devices as though the request was for a peer device address of one of the second plurality of peer devices." Redlich discloses that, "If a DNS server can not resolve a given name from his locally held database, it forwards the query to a DNS server that is responsible for the zone to which the name belongs." Column 8, lines 15-18. Rather than responding to a request for a peer device that is not local as though it were, the DNS server disclosed by Redlich forwards the query.

5. In regard to claims 2, 11, the Examiner asserts that Redlich discloses:

the first and second network servers are at equivalent hierarchical levels. Column 8, lines 15-18

Applicant respectfully disagrees. Redlich does not disclose a hierarchical network system structure. The first and second network servers are at equivalent hierarchical levels only in the sense that they are at the one peer level in a peer-to-peer network.

6. In regard to claims 3, 12, the Examiner asserts that Redlich discloses:

the first and second network servers have a common zone relationship. Column 8, lines 11-15

Applicant respectfully disagrees. The cited portion of Redlich discloses that the two servers are in different zones.

7. In regard to claims 4, 13, 16, 20, the Examiner asserts that Redlich discloses:

the second network server requires access authorization from the first network server before a common zone is established. Access authorization is inherent to any network.

Applicant has not stated the type of access authorization, so access authorization is broadly construed as the establishment of access through a connection.

The Examiner considers access authorization as claimed to be susceptible to being broadly construed as the establishment of access through a connection. Applicant has amended the claim to clarify that access authorization permits address discovery of the first plurality of peer devices. Redlich does not disclose access authorization that permits restricting access for specific groups of peer devices within the network.

8. In regard to claim 5, the Examiner asserts that Redlich discloses:

a third plurality of peer devices, each of the third plurality of peer devices not being coupled to any other of the first, second, and third pluralities of peer devices; Figure 8

a third network server coupled to each of the third plurality of peer devices and to the second network server, the third network server to manage and maintain a third name-to-address resolution index that includes a list of addresses for each of the third plurality of peer devices, the third network server configured to respond to the request for the peer device address of the one of the first plurality of peer devices by querying the second network server such that the third network server responds to the request with the peer device address of the one of the first plurality of peer devices as though the request was for a peer device address of one of the third plurality of peer devices. Column 8, lines 1-18

Applicant respectfully disagrees. Redlich defines a server as "a program." Col. 7, lines 8-10. The present application defines a server as a "computer or device." Specification, p.4, lines 14-17. Applicant has amended the claims to replace "server" with --server device-- to make this distinction clear. Applicant is unable to find anything in the cited figures or text that discloses a server device or a hierarchical network system structure as claimed. In particular, applicant finds nothing in the cited art that discloses "the third network server device configured to respond to the request for the peer device address of the one of the first plurality of peer devices by querying the second network server device such that the third network server device responds to the

request with the peer device address of the one of the first plurality of peer devices as though the request was for a peer device address of one of the third plurality of peer devices." Redlich discloses that, "If a DNS server can not resolve a given name from his locally held database, it forwards the query to a DNS server that is responsible for the zone to which the name belongs." Column 8, lines 15-18. Rather than responding to a request for a peer device that is not local as though it were, the DNS server disclosed by Redlich forwards the query.

9. In regard to claim 6, the Examiner asserts that Redlich discloses:

the second network server is also configured to query the third name-to-address index such that the second network server responds to a request for a peer device address of one of the third plurality of peer devices as though the request was for a peer device address of one of the second plurality of peer devices. Column 8, lines 1-18

Applicant respectfully disagrees. Redlich defines a server as "a program." Col. 7, lines 8-10. The present application defines a server as a "computer or device." Specification, p.4, lines 14-17. Applicant has amended the claims to replace "server" with --server device-- to make this distinction clear. Applicant is unable to find anything in the cited figures or text that discloses a server device or a hierarchical network system structure as claimed. In particular, applicant finds nothing in the cited art that discloses "the second network server device responds to a request for a peer device address of one of the third plurality of peer devices as though the request was for a peer device address of one of the second plurality of peer devices." Redlich discloses that, "If a DNS server can not resolve a given name from his locally held database, it forwards the query to a DNS server that is responsible for the zone to which the name belongs." Column 8, lines 15-18. Rather than responding to a request for a peer device that is not local as though it were, the DNS server disclosed by Redlich forwards the query.

10. In regard to claim 7, the Examiner asserts that Redlich discloses:

the first network server is also configured to query the second name-to-address index such that the first network server responds to a request for a peer device address of one of the second plurality of peer devices as though the request was for a peer device address of one of the first plurality of peer devices. Column 8, lines 1-18

Applicant respectfully disagrees. Redlich defines a server as "a program." Col. 7, lines 8-10. The present application defines a server as a "computer or device." Specification, p.4, lines 14-17. Applicant has amended the claims to replace "server" with --server device-- to make this distinction clear. Applicant is unable to find anything in the cited figures or text that discloses a server device or a hierarchical network system structure as claimed. In particular, applicant finds nothing in the cited art that discloses "the first network server device responds to a request for a peer device address of one of the second plurality of peer devices as though the request was for a peer device address of one of the first plurality of peer devices." Redlich discloses that, "If a DNS server can not resolve a given name from his locally held database, it forwards the query to a DNS server that is responsible for the zone to which the name belongs." Column 8, lines 15-18. Rather than responding to a request for a peer device that is not local as though it were, the DNS server disclosed by Redlich forwards the query.

11. In regard to claim 9, the Examiner asserts that Redlich discloses:

an output interface to couple the processing unit to the at least one peer on the first network. Figure 8

Applicant relies on the patentability of the claims from which this claim depends to traverse the rejection without prejudice to any further basis for patentability of this claim based on the additional elements recited.

12. In regard to claims 10, 15, 19 the Examiner asserts that Redlich discloses:

the processing unit responds to a name-to-address resolution request by sending the requested address if it is found, and sending an address not found reply if the address is not found. Column 9, lines 13-24

Applicant relies on the patentability of the claims from which these claims depend to traverse the rejection without prejudice to any further basis for patentability of these claims based on the additional elements recited.

13. The Examiner rejects claims 14, 18 on the same basis as claims 1-3 and applicant likewise traverses the rejection on the same basis.

14. In regard to claims 17, 21, the Examiner asserts that Redlich discloses:

there is no common zone relationship between the first server and the second server, and derivative common zone name-to-address resolution is selectively permitted by a server having common zone relationships with the first server and the second server. Column 8, lines 11-15

Applicant respectfully disagrees.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-21 under 35 U.S.C. § 102(e) as being anticipated by Redlich (U.S. Patent No. 6,591,306).

Rejection Under 35 U.S.C. § 112

16. The Examiner rejects claims 1, 5, 8, 11 and 18 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

17. The Examiner considers that applicant's claims to a server coupled to each of the peer devices allows those peer devices to also be coupled. As suggested by the Examiner, applicant has amended the claims to replace "coupled" with --directly coupled-- to make clear that peer devices are not coupled without the presence of an intermediate device. Applicant found no problem in claim 11 and assumes the Examiner intended to refer to claim 14, which applicant has amended.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1, 5, 8, 11 and 18 under 35 U.S.C. § 112, second paragraph.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.